

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re: NEURONTIN MARKETING AND
SALES PRACTICES LITIGATION

)
) MDL Docket No. 1629
)

)
) Master File No. 04-10981
)

THIS DOCUMENT RELATES TO:
ALL ACTIONS

)
) Judge Patti B. Saris
)
)

**JOINT MOTION FOR POSTPONEMENT OF DEADLINE
FOR FILING OF SECOND CASE MANAGEMENT ORDER**

The parties hereby jointly move for a postponement of the deadline for the filing of a proposed second case management order (or orders). The grounds for this motion are:

1. The Court instructed the parties to submit a proposal or proposals for a second case management on or before today, February 9, 2005.
2. The due date was tied to the date for the next case management conference, which was scheduled for February 11, 2005.
3. This afternoon, the Court postponed the conference due to the weather forecast.
4. The parties have been unable to agree on a joint proposal. Although the parties are prepared to make separate filings today, if given more time, they may be able to reach an agreement (or at least narrow the divide), which would lessen the burden on the Court.
5. The parties therefore jointly request that the Court postpone the deadline for the filing of a proposal or proposals to February 18, 2005.

WHEREFORE, the parties respectfully request that the Court grant the requested

postponement.

Dated: February 9, 2005

Respectfully submitted,

By: /s/ James P. Rouhandeh
James P. Rouhandeh, Esquire
Davis Polk & Wardwell
450 Lexington Avenue
New York, NY 10017

By: /s/ Thomas M. Sobol
Thomas M. Sobol
Hagens Berman, LLP
One Main Street, 4th Floor
Cambridge, MA 02142

By: /s/ David B. Chaffin
David B. Chaffin, Esquire
Hare & Chaffin
160 Federal Street, 23rd Floor
Boston, MA 02110

Counsel for Defendants, Pfizer Inc., et al.

Plaintiffs' Liaison Counsel

By: /s/Don Barrett
Don Barrett, Esquire
Barrett Law Office
404 Court Square North
P.O. Box 987
Lexington, MS 39095

By: /s/Daniel Becnel, Jr.
Daniel Becnel, Jr., Esquire
Law Offices of Daniel Becnel, Jr.
106 W. Seventh Street
P.O. Drawer H
Reserve, LA 70084

By: /s/James R. Dugan, II
James R. Dugan, II, Esquire
Dugan & Browne, PLC
650 Poydras Street, Suite 2150
New Orleans, LA 70130

By: /s/Thomas Greene
Thomas Greene, Esquire
Greene & Hoffman
125 Summer Street
Boston, MA 02110

By: /s/Barry Himmelstein

Barry Himmelstein, Esquire
Lieff Cabraser Heimann &
Bernstein
Embarcadero Center West
275 Battery Street, 30th Floor
San Francisco, CA 94111-3339

**Members of the Class Plaintiffs'
Steering Committee**

By: /s/Richard Cohen
Richard Cohen, Esquire
Lowey Dannenberg Bemporad
& Selinger, P.C.
The Gateway
One North Lexington Avenue
White Plains, NY 10601

By: /s/Linda P. Nussbaum
Linda P. Nussbaum, Esquire
Cohen Milstein Hausfeld & Toll
150 East 52nd Street
Thirteenth Floor
New York, NY 10022

**Members of the Plaintiffs' Non-Class
Steering Committee**